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9 Attorney for Debtor
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UNITED STATE BANKRUPTCY COURT
DISTRICT OF NEVADA

In the Matter of:] BK-S-05-12090LBR
SHIRLEY MAE ROBINSON] Chapter 13
Debtor.] Hearing Date: 7-24-2009
] Hearing Time: 1:30PM

DEBTOR'S MOTION TO SET ASIDE ORDER PERMITTING RELIEF OF STAY

COMES NOW, Debtor, SHIRLEY MAE ROBINSON, by and through her attorney, **DANI L. STEPHENS, ESQ.**, to move this Honorable Court to set aside the order permitting Wells Fargo a relief from Automatic Stay on the following grounds:

1. Debtor alleges that the bank is mistaken in adding up her payments. She has proof that she is only one payment in arrears.
2. Debtor had tried assiduously to get a reverse mortgage in place and everything was ready to go when it was discovered another attorney, Christopher Byrd, had filed a foreign lien on behalf of a California firm, for \$35,000 against her home for a debt owed by a totally different Shirley Robinson and her husband. Efforts to have this lien removed short of court action have been in vain,- in spite of proof being provided.

1 3. Debtor respectfully prays this court to vacate the Order
2 issued on July 24th and allow her the opportunity to prove the
3 motion for relief from stay was untimely.

4 WHEREFORE based on the foregoing, Debtor prays that this
5 Honorable Court set aside Creditor's motion to dismiss and grant her
6 an extension if needed. She also asks for a full accounting of her
7 payments as she believes the Mortgage holder Wells Fargo bank has
8 added them up wrongly.

9 DATED, this 31st day of July, 2009.

10 Respectfully submitted by:

11 /s/ DANI L. STEPHENS, ESQ.
12 **DANI L. STEPHENS, ESQ.**
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